

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO:

All Suits Against the Saint Thomas Entities

MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)

**SAINT THOMAS ENTITIES' MOTION FOR LEAVE TO FILE
CERTAIN EXHIBITS UNDER SEAL**

The Saint Thomas Entities¹ move this Honorable Court, pursuant to Local Rule 7.2, to permit Exhibits D and L of the Saint Thomas Entities' Response to the PSC's Motion to Compel to be filed under seal. These documents should remain under seal until this MDL is terminated and should then be returned to local counsel for the Saint Thomas Entities. The exhibits are as follows, and contain material designated as Confidential Discovery Material by the Saint Thomas Entities pursuant to this Court's Third Amended Protective Order (Dkt. No. 814):

- **Exhibit D**, Exhibit 517 from July 29, 2015 Deposition of Cindy Williams; and
- **Exhibit L**, Transcript Excerpt from Aug. 21, 2015 Deposition of Carmen Leffler, D.Ph.

WHEREFORE, the Saint Thomas Entities respectfully request that the Court permit the exhibits referenced above to be filed under seal.

¹ Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network.

Dated: October 5, 2015

SAINT THOMAS WEST HOSPITAL F/K/A
ST. THOMAS HOSPITAL, SAINT THOMAS
HEALTH, AND SAINT THOMAS
NETWORK

By their attorneys,

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CERTIFICATE OF SERVICE

I certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing this 5th day of October, 2015.

/s/ Sarah Kelly

Sarah P. Kelly

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